

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JESUS GOMEZ)	
)	
Plaintiff,)	Case No. 20 CV 6051
)	
v.)	Judge Robert W Gettleman
)	
OFFICER RODARTE #5319 and)	Magistrate Jeffrey Cummings
OFFICER VINCENT RYAN)	
)	
Defendants.)	

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD

NOW COMES attorney SCOTT T. KAMIN on behalf of JESUS GOMEZ and moves to withdraw as counsel of record. In support of this motion, Mr. KAMIN states as follows:

1. In 2016, Plaintiff filed his appearance as lead counsel in the case of *Thomas Bishop v. Joseph White et al.*, 16 cv 6040, in this District.
2. On or about December 1, 2019, members of the firm, *Loevy & Loevy* filed their appearances as co-counsel (“*Loevy attorneys*”). As part of the co-counselor agreement, the *Loevy attorneys* were supposed to handle the bulk of written and oral discovery.
3. The *Loevy attorneys* and the defense exchanged hundreds of pages of discovery and completed twenty depositions.
4. Mr. Kamin and the *Loevy attorneys* were to decide later how to divide trial duties.
5. On March 3, 2021, all of the *Loevy attorneys* suddenly withdrew as co-counsel. The attorney in charge of discovery quit their firm two weeks before the *Loevy attorneys* withdrew.
6. The *Loevy attorneys* left more than ten depositions and many discovery issues to be prosecuted.
7. Since then, Mr. Kamin has been forced to engage vigorously in the *Bishop* discovery, a very time-intensive activity, especially since there are fifteen defense counsel involved in the case.
8. Mr. Kamin has been required to engage in many all day depositions in the *Bishop* case.
9. Mr. Kamin has been forced to withdraw from some of his active cases in order to properly prosecute the *Bishop* case.
10. Eventually, Mr. Kamin may engage new co-counsel, but no such counsel are anticipated anytime in the near future.

11. In the present case, filed in 2020 and at the written discovery stage currently, Mr. Kamin cannot handle discovery in a timely manner, and will not be able to zealously represent Jesus Gomez in the future. Judge Cummings ordered written discovery to be completed by July 12, 2021. Mr. Kamin could not comply with the order and his schedule will not permit him to complete his responses until late August of 2021.
12. To Mr. Kamin's knowledge, Mr. Gomez has not retained a new attorney though Mr. Kamin has provided him names of local police misconduct attorneys.
13. Mr. Kamin has emailed Mr. Gomez and will send him a copy of this Motion.

WHEREFORE, attorney KAMIN requests this Court grant him leave to withdraw as counsel for Plaintiff.

Respectfully submitted,

/s/Scott T. Kamin

Scott T. Kamin

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